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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:
MILLOLA HOLDINGS LLC,
Debtor
Case No.:21-13893-ABL
Chapter 7
Date: January 17, 2024
Time: 1:30 p.m.

**DECLARATION OF DAVID A. RIGGI
IN SUPPORT OF
MOTION TO CONVERT TO CHAPTER 11,
OR DISMISS CHAPTER 7, OR REINSTATE CHAPTER 11**

I, David A. Riggi, declare, under penalty of perjury, the following:

1. I am a resident of Las Vegas Clark County, Nevada, and I am the attorney for Millola Holdings LLC (Company” or “Millola”). I make this statement based on my actual knowledge and personal experience. My statements are based upon the best of my recollection.

2. I believe that Millola has prosecuted this case in good faith and has not intentionally failed to abide by the laws, rules, and policies governing bankruptcy. Millola has done everything I have asked of them.

3. The registry of claims, accessible via Pacer, indicates that only three creditors have filed proofs of claims. There are no creditors listed in the schedules other than these three. Deutsche Bank, the mortgage holder on one of the properties, is the only remaining creditor and has been, and will continue to be, treated according to the provisions of the Chapter 11 plan. The other two creditors, J.P. Morgan Chase and the Internal Revenue Service, I believe have been completely satisfied.

1 4. A series of ongoing health concerns culminated in a major health event, a stroke, on May
2 5, 2022, that required weeks of my hospitalization and my still-ongoing convalescence. I believe my
3 health concerns may have affected my ability to always timely and expeditiously prosecute the legal
4 cases under my charge. I believe I was affected not just on May 5, 2022, going forward, but also for
5 several weeks if not months preceding that date. So, even though I was making certain appearances in
6 court and filing certain documents during the weeks before the health event, I believe my diligence may
7 have been inadvertently affected through circumstances that were not foreseeable to me at the time. Any
8 issue regarding a failure to timely upload an order confirming the plan of reorganization in this case, I
9 believe, would be within the scope of inadvertence and/or excusable neglect.
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11

12 5. I have taken appropriate measures, I believe, to address any concerns for current and
13 future clients. Nevertheless, with medical professionals, I continue to monitor my circumstances and
14 health so that I may make the most informed decisions concerning the practice of law.
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I declare under penalty of perjury that the foregoing is true and correct.

Dated this January 15, 2024.

18 /s/ David A. Raggi

David A Raggi